

**IN THE UNITED STATES DISTRICT COURT FOR
THE EASTERN DISTRICT OF VIRGINIA
NORFOLK DIVISION**

Latasha Holloway, *et al.*,

Plaintiffs,

v.

City of Virginia Beach, *et al.*,

Defendants

Civil Action No. 2:18-cv-0069

**PLAINTIFFS' BRIEF IN OPPOSITION TO DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

PLAINTIFFS' EXHIBIT 6

August 30, 2019 Email from Defs. Counsel Chris Boynton

Monday, November 4, 2019 at 2:23:30 PM Central Standard Time

Subject: Re: Holloway - Data referenced in Spencer rebuttal report but not provided
Date: Monday, November 4, 2019 at 2:23:09 PM Central Standard Time
From: Annabelle Harless <aharless@campaignlegalcenter.org>
To: Danielle Lang <dlang@campaignlegalcenter.org>
Attachments: image001.png, image002.png

From: Christopher S. Boynton <CBoynton@vbgov.com>
Sent: Thursday, August 29, 2019 12:13 PM
To: Danielle Lang <dlang@campaignlegalcenter.org>
Cc: Gerald L. Harris <GLHarris@vbgov.com>; Joseph M. Kurt <jKurt@vbgov.com>
Subject: Holloway - Data referenced in Spencer rebuttal report but not provided

Danielle,

In Dr. Spencer's rebuttal report, he explains that his utilization of 'equivalence testing' to determine whether there is cohesion among Blacks, Asians, and Hispanics relies upon estimates of Hispanic (alone) and Asian (alone) support (and the corresponding confidence intervals) for each candidate. Although he provides those numbers for one example candidate—Mr. Rouse in 2018—he has not provided his Asian and Hispanic estimated vote totals for any other candidates. We request that you promptly provide us with that underlying data in chart format. Most appreciated.

Regards,

Chris



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